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DEC 7 - 2018

Office of Enforcement, Compliance
and Environmental Justice

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December 2, 2018

Director, Air and Toxics Technical Enforcement Program
Office of Enforcement, Compliance & Environmental Justice
EPA Region 8
Mail Code: 8ENF-AT
1595 Wynkoop Street
Denver, CO 80202-1129

Colorado Department of Public Health and Environment
Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246

Subject: NSPS OOOOa Annual Report (September 5, 2017 – September 5, 2018)

Source: Crystal River Compressor Station (Colorado AIRS ID: 045/0078)

Dear Director:

Per regulation 40 CFR 60.5420a(b), the initial NSPS OOOOa annual report is due no later than 90 days after the end of the initial compliance period. The compliance period for the affected sources at the Crystal River Compressor Station begins on September 5, 2017 and ends on September 5, 2018. Furthermore, regulations require that each report be submitted in accordance with §60.5420a(b)(11) which requires the report be sent to the addresses listed in §60.4 when the reporting form specific to this subpart is not available in CEDRI at the time that the report is due.

40 CFR 60.5420a(b) states that the compliance report must contain the applicable information from paragraphs (b)(1) through (8). The paragraphs that apply to affected sources at Crystal River Compressor Station are listed below along with the required answers.

(I) General information.

- (i) Rocky Mountain Natural Gas, LLC
Crystal River Compressor Station
NE 1/4 of Section 1, Township 8S, Range 89W, in Garfield County, Colorado
39.391417, -107.273070
- (ii) Affected facilities: reciprocating compressor on engine 852 and the collection of fugitive emissions components
- (iii) Reporting period: September 5, 2017 through September 5, 2018

- (iv) Certification by a certifying official of the truth, accuracy, and completeness of the report.

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) (6)

Signature

12-3-2018
Date

Susan Bailey
Name

VP, Gas Operations
Title

- (4) Information for each reciprocating compressor affected facility. (852 compressor)
- (i) The compressor was started up on September 5, 2017 and the unit has operated a total of 2,135 hours.
- (ii) No deviations occurred during the reporting period.
- (7) Monitoring records for each survey that include the information specified in paragraphs (b)(7)(i) through (xii) of this section.
- See the attached records.

If you have any questions about the information presented, I can be reached at 307-778-2155.

Sincerely,

(b) (6)

Cole Anderson
Environmental Manager

Attachment: NSPS OOOOa Component Monitoring Survey Information

Rocky Mountain Natural Gas, LLC - Crystal River Compressor Station
Annual NSPS OOOOa Fugitive Emissions Monitoring Report

Survey#	Date	Beginning Time	Ending Time	OGI Inspector	Certified Training	Prior Experience	Ambient Temperature (deg F)	Sky Conditions	Maximum Wind Speed (MPH)	Monitoring Instrument	Serial#
1	10/24/2017	9:37 AM	12:06 PM	Lewie Murray	Yes	Yes	47	Clear Sky	5	FLIR GF320	44401642
2	12/6/2017	10:20 AM	1:10 PM	Evan Yater	Yes	Yes	12	Partly Cloudy	6	FLIR GF320	44401721
3	2/15/2018	9:30 AM	12:05 PM	Evan Yater	Yes	Yes	27	Cloudy	3	FLIR GF320	44401721
4	5/3/2018	9:00 AM	12:00 PM	Evan Yater	Yes	Yes	35	Rain	1.7	FLIR GF320	44401721
5	7/24/2018	12:30 PM	2:30 PM	Casey Richardson	Yes	Yes	84	Partly Cloudy	3.9	FLIR GF320	44401721
6	11/1/2018	9:05 AM	11:40 AM	Casey Richardson	Yes	Yes	34	Overcast	0.1	FLIR GF320	44401721

Survey#	Deviations from the Monitoring Plan?	Number and Type of Leaking Component	Number and Type of Component Not Repaired Per §60.5397a(h)
1	No deviation from the monitoring plan	1 Flange, 1 Valve, 3 Connectors	1 Valve and 1 Connector
2	No deviation from the monitoring plan	2 Valves, 1 Flange, 1 Connector	None
3	No deviation from the monitoring plan	3 Valves, 2 Flanges	None
4	Started inside due to rain and then finished yard.	1 Valve, 1 Connector, 1 Flange	1 Flange
5	No deviation from the monitoring plan	1 Flange, 1 Connector	1 Connector
6	No deviation from the monitoring plan	3 Valves, 2 Bolts	None

Survey#	Number and Type of Difficult-to-Monitor and Unsafe-to-Monitor Components	Date of Successful Repair	Number and Type of Components Placed on Delay of Repair and Explanation	Resurvey Information
1	No Difficult-to-Monitor or Unsafe-to-Monitor Components	11/10/2017	1 Valve - Leak on main distribution line leaving station and it will take shutting down the line to repair it. This line provides gas to the lower valley and shutting it down would cause significant gas supply problems.	Method 21 - Soap Bubbles
2	No Difficult-to-Monitor or Unsafe-to-Monitor Components	12/6/2017	None	Fixed during OGI inspection and resurveyed.
3	No Difficult-to-Monitor or Unsafe-to-Monitor Components	2/15/2018	None	Fixed during OGI inspection and resurveyed.
4	No Difficult-to-Monitor or Unsafe-to-Monitor Components	7/9/2018	1 Flange - flange is on 12" valve on the main manifold and requires facility shutdown for repair.	Method 21 - Soap Bubbles
5	No Difficult-to-Monitor or Unsafe-to-Monitor Components	7/30/2018	None	Method 21 - Soap Bubbles
6	No Difficult-to-Monitor or Unsafe-to-Monitor Components	11/1/2018	None	Fixed during OGI inspection and resurveyed.